

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano :
v. :
The City of Nashua, et al. :
:

AFFIDAVIT OF MEGAN CARON

Megan Caron hereby deposes and says:

1. I am over the age of 18 and have personal knowledge of the facts set forth in this affidavit.
2. I was hired by the City of Nashua in December 2018 and have worked in various capacities for the City since that time. I am currently Chief of Staff. In this position, I have reviewed and have familiarity with Plaintiff Laurie Ortolano's public interactions with the City and attendance at the meetings of the Board of Aldermen ("BOA"), the Board of Assessors, and other public meetings, including budget meetings.
3. The City has compiled for purposes of this litigation Plaintiff's numerous public comments at these meetings, a true and accurate copy of which is attached hereto as Exhibit A.
4. As can be seen therein, beginning in September 2018, Ms. Ortolano became a regular participant in meetings of the BOA and the Board of Assessors, speaking at six such meetings during the last four months of that year and twenty more in the first six months of 2019.
5. In the spring of 2019, Ms. Ortolano – through counsel – submitted to the City an investigative report prepared by private investigator William Freyler, a true and accurate copy of which is attached hereto as Exhibit B.

6. It is my understanding that on or about September 22, 2019, Detective Frank Lombardi met with Ms. Ortolano and advised her that certain employees of the Assessing Department did not wish to speak with her outside of their work in the Assessing Department.

7. Plaintiff remained a regular attendee of public meetings thereafter, frequently criticizing City officials. Indeed, just two days later she appeared and spoke at some length at a Board of Aldermen meeting, criticizing Kleiner and the recently released Assessing Department procedures. *See Ex. A* at pp. 97-99 (commenting on Assessing Departments policies and procedures manual).

8. The following week she attended (and spoke at) a Board of Assessors meeting. *See Ex. A.* at pp. 99-103. That would be one of just nine meetings of those two Boards that she would speak at after the warning through the end of 2019. *See Ex. A.* at pp. 99-123. Plaintiff spoke at no fewer than 25 public meetings in 2020. *Ex. A.* at pp. 123-179.

Subscribed and sworn to under the pains and penalties of perjury this 29th day of May, 2024.

/s/ Megan Caron
MEGAN CARON

STATE OF NEW HAMPSHIRE
COUNTY OF HILLSBOROUGH

Sworn to and subscribed before me by Megan Caron, this 29 day of May, 2024.

/s/ Daniel R. Healey
Notary Public/Justice of the Peace
Print Name: Daniel R. Healey
My Commission Expires: March 24, 2024